



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

Friday, July 06, 2007

Mr. L. Chase Fortenberry
C/o Georgia-Pacific Corporation
133 Peachtree St, N.E.
P.O. Box 105605 (30348)
Atlanta, GA 30303

RE: Allied Paper/ Portage Creek/ Kalamazoo River Site
Georgia-Pacific Kalamazoo Mill and Former Hawthorne Mill
Comments: Post Removal Site Control Plan

Dear Mr. Fortenberry:

Region 5 has determined that the revised *Post Removal Site Control Plan*, submitted by Arcadis Inc. on behalf of Georgia Pacific Corporation on July 05, 2007, addresses the comments provided by Region 5 on April 19, 2007. Region 5 approves the revised *Post Removal Site Control Plan*, pending the incorporation of the comments below.

Comment 1 – “Additionally the area has been remediated to below unrestricted residential criteria.” should be removed from section 3.2. This statement is inaccurate.

Comment 2 – The description of the excavation and restoration efforts should be rephrased in Section 3.3.2. The current phrasing is confusing. A suggestion is offered below.

3.3.2 Oxbow Area

As prescribed in the TCRA Work Plan the upper 2 feet of soil in the Oxbow Area was excavated and the area backfilled with clean imported material, graded and partially vegetated (Figure 4). This excavated area extended beyond the original footprint in order to remove some residual material near the bank of the Oxbow Channel and on the Michigan Department of Transportation (MDOT) right of way along King Highway. The excavated area near the bank of the Oxbow Channel is where PCBs were detected at a concentration of 150 mg/kg; however the excavation area did not extend on to the bank. Restoration efforts near the bank of the Oxbow Channel will include vegetating the area with woody shrubs. Existing trees, including stumps and root systems, were removed from the MDOT right of way along

King Highway prior to excavation in this area. The original foot print and MDOT right of way along King Highway were backfilled, graded, and are being left to naturally vegetate. Inspections of the vegetation will be conducted quarterly and immediately following major precipitation events (5-year, 24-hour storm) until strong vegetated cover is established. The vegetation will be inspected for evidence of bare spots, stressed vegetation, cracks, settlement, losses in thickness, and slope movement (e.g., deposition of soil towards the bottom of the bank of the Oxbow Channel); and will be maintained as necessary. Similar to the Refuse Area, a 5-year, 24-hour storm will be identified based on precipitation data from the Kalamazoo Airport. Additionally, all temporary erosion and sedimentation controls (i.e., silt fence) constructed during the TCRA will be inspected and maintained until the vegetation is established. The Post-Removal Site Control Inspection Form is provided in Attachment A.

In addition, a photographic log of controls will be maintained on site, with an entry for each control (i.e., vegetation and temporary erosion and sedimentation controls [i.e., silt fence]) made during inspections. The photographic log will be maintained beginning at the time of seeding of the Oxbow Area and continue until the controls are complete. The photographic log will be included as an appendix of each inspection report.

Region 5 appreciates your attention to this matter, and should any questions related to the task arise, please do not hesitate to call me at 312.886.1434.

Sincerely,



Sam Chummar, Remedial Project Manager
U.S. EPA Region 5
Superfund Division – Remedial Response Branch #1
77 W Jackson Blvd. (SR-6J)
Chicago, IL 60604

cc: Eileen Furey, C-14J
James Saric, SR-6J
Michael Berkoff, SR-6J
Keith Krawczyk, MDEQ
Patrick McGuire, Arcadis